Case 24-11685-amc Doc 78 Filed 05/23/25 Entered 05/23/25 16:15:19 Desc Main

Document Page 1 of 1 UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Hortense C. Tippett : Chapter 13

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Debtor : Bky. No. 24-11685

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Motion to Modify Plan

AND NOW, Debtor Hortense C. Tippett, by and through her attorney, moves this Court to modify her confirmed chapter 13 plan. In support of this motion, the Debtor states as follows:

- 1. The Debtor filed this case under chapter 13 on May 16, 2024.
- 2. The plan was confirmed on February 13, 2025.
- 3. The Debtor asks the Court to approve the Second Amended Plan.
- 4. The proposed plan provides for payment of post-petition mortgage arrears to Wilmington Savings Fund Society, c/o Celink, pursuant to stipulation of the parties filed as ECF No. 74, approved by the Court on May 22, 2025, ECF No. 76.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: Ž - E'23 Gwuvz CIBIK LAW, P.C. Counsel for Debtor

/s/ Michael A. Cibik Michael A. Cibik (#23110)

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